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EX PARTE

March 31, 1997

Mr. William Caton
Acting Secretary
Federal Communications Commission
1919 M Street N.W. Room 222
Washington, D.C. 20554

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Federal Communications Commission
Office of Secretary

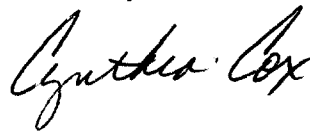
Re: CC Docket No. 95-116, Local Number Portability

Dear Mr. Caton:

Today William Shaughnessy, Dennis Davis and the undersigned met with Neil Fried and Len Smith of the Competitive Pricing Division of the Common Carrier Bureau to discuss the attached material. Please include this material in the above referenced proceeding.

Two copies of the notice are filed in accordance with Commission rules. Please call me with any questions on this information.

Sincerely,



cc: Neil Fried (w/o attachment)
Len Smith (w/o attachment)

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Operations Support Systems

3/28/97			
	<u>Acronym</u>	<u>DESCRIPTION</u>	<u>Main Purpose of System</u>
1	ALI	Automatic Location Identification	Provides actual address information on 911 calls to the Public Safety Answering Points (PSAPs)
2	ATLAS	Application for Telephone Number Load Administration & Selection	Performs TN load and selection & supports TN selection, inventory & assignment for services beyond POTS.
3	CABS	Customer Access Billing System	Maintains Access Customer billing information.
4	CRIS	Customer Record Information System	Maintains local customer record and billing information.
5	BONIS	BellSouth Online NXX Information System	Selects an NPA/NXX for assignment to a Code Applicant, verifies no cross-boundary seven digit dialing conflicts, notifies the code Applicant of the assignment and effective date.
6	CAS/GATEWAY	Craft Access System	Provide field technicians access to LMOS/MLT-2.
7	COFFI	Central Office Files Interface	Provide information of services, features, NPANXX data PIC/LPIC carrier data
8	COSMOS	Computer System for Mainframe Operations	Currently does TN admin; makes MDF assignments to promote shortest possible jumpers
9	COSMOS-TN Suppression	Computer System for Mainframe Operations	Currently does TN admin; makes MDF assignments to promote shortest possible jumpers
10	DBAS II	Data Base Administration System	Used to update the Operator Services Line Information Data Base (LIDB)
11	DIS	Database Integrity System	Compares BOCRIS, RSAG, LFACS, COSMOS & LMOS - identifies & corrects discrepancies.
12	ECS	Error Correction System	Screens Central Office switch billing records for illogical content.
13	E911-IREIS	E911 Interim Regional Emergency Information System	Provides customer information to the Public Safety Answering Points (PSAPs)

Operations Support Systems

3/28/97			
	<u>Acronym</u>	<u>DESCRIPTION</u>	<u>Main Purpose of System</u>
14	FACS	Facility Assignment and Control System	Automatically processes the assignment of service orders and works with SOAC, LFACS, COSMOS, PAWS and HAL.
15	HAL	Hands Off Assignment Logic	Resolves SOAC, LFACS and COSMOS Requests for Manual Resolution (RMAs)
16	K2/LAN	K2/LAN	Terminal emulation for RCMAG fallout from MARCH.
17	LFACS	Loop Facilities Assignment and Control System (Module of FACS)	Maintains inventory of Outside Plant facilities.
18	LIDB	Line Information Data Base	Contains information on calling cards, third number and collect billing
19	LIST	List Information System	Source data for Operator Services Products, White & Yellow Page Directories.
20	LMOS-HOST	Loop Maintenance Operations System - Host	Application used to enter status, track and test customer trouble reports & service orders. (POTS & Non-Designed services)
21	MARCH	MARCH	Translates line related service order data into switch provisioning messages.
22	MATV	Mechanized AMA Test & Verification	Tests central office routing and billing translations to ensure they conform to the BellSouth Routing and Billing Standard (BSRBS)
23	MFVS	Mechanized Field Verification System	Verifies and corrects database records for OSP cross-connect terminals
24	MLT	Mechanized Loop Testing	Uses operational software to make loop measurements and to provide interactive testing capabilities.
25	MTS	Mechanized Translation System	Stores translations routing/billing forms for 1A, 5ESS and D100 switches.
26	MYNAH	MYNAH (not an acronym)	Scenario testing across systems such as SOCS, SOAC & MARCH.

Operations Support Systems

3/28/97		
<u>Acronym</u>	<u>DESCRIPTION</u>	<u>Main Purpose of System</u>
NetPilot	NetPilot	NetPilot replaces memory administration portion of SEAS;
NeTTS	Network Trunk Translation System	Maintain global title translations for the CCS Signal Transfer Points
OM	Order Manager	Mini-computer based system used to automatically generate trunk group and member level translations for Circuit Provisioning Group.
ORION	On-Line RSAG Interface For Order Negotiation	Provisions the establishment and disconnect of QUICK Service (QS) lines via the service order process.
P/SIMS	Products/Services Inventory Management System	Provides on-line presentation of address and living unit data for customer contact personnel.
PREDICTOR	Predictor	On-line mechanized system that provides, at the central office switch level, current and planned service availability, tariff and inventory services.
RNS	Regional Negotiation System	Monitors ALIT messages from electronic switches and alarms from cable pressure systems
RE-LOG	Referred to Engineering LOG	Supports service order negotiation and account inquiry for Consumer Services.
RSAG	Regional Street Address Guide	Tracks all held service orders in the company.
SOAC	Service Order Analysis and Control (Module of FACS)	Provides customer information associated with a customer location/address to assist in determining service due dates, feature and service availability and assigning telephone numbers.
		Receives service orders from the service order processor, parses FIDs and USOCs and generates loop facility and central office assignment requests to send on to SOP and other provisioning systems.

Operations Support Systems

3/28/97			
	<u>Acronym</u>	<u>DESCRIPTION</u>	<u>Main Purpose of System</u>
38	SOAC Interface to ATLAS	Service Order Analysis and Control (Module of FACS) Interface	Provides the electronic interface between ATLAS and the SOAC.
39	SOCS	Service Order Communications System	Service order processor responsible for the collection, storage and distribution of all service orders.
40	TAFI	Trouble Analysis Facilitation Interface	System used to perform automated trouble receipt, screening and resolution for non-designed telephone number trouble reports.
41	WFA-DI	Work Force Admin - Dispatch In	Automates the work assignments of central office technicians to install and maintain "designed" as well as certain "non designed" services.

Local Number Portability

BellSouth Telecommunications, Inc.

LNP Cost Recovery

- **LNP Cost Drivers**
- **What costs should be included ?**

Network Differences

LECs

- LNP not market driven decision
- Network configuration historically driven:
 - Rate center based,
 - Legacy OSSs based on TN
 - Ubiquitous service

IXCs & CLECs

- Entering local market & LNP is market driven decision
- Network configuration not historically driven:
 - Fewer switches for larger areas
 - New OSSs-
 - Target specific areas

Costs Necessary for LNP

TYPE 1: Costs of Installing & Administering Regional NPAC
Plus
TYPE 2: Direct Carrier- Specific Costs
Equals
Total LNP Costs

FCC recognizes that (FCC Order 97-74, para 19) “all interconnected carriers are all likely to rely on each other’s network...”



- All Type 1 & Type 2 costs must be incurred for LNP to be successful;
- All Type 1 & Type 2 costs must be treated the same.

BellSouth's Type II Costs Include

- Equipping end office switches with LNP software,
- Upgrading switch processors,
- Establishing a local SMS,
- Modifying & adding SS7 network links,
- Modifying SCPs necessary for LNP,
- Capacity enhancements to STPs
- Modifying Line Information Data Bases (LIDB)
- Modifying Operator Services switches
- Modifications to make legacy systems LNP capable. BellSouth has identified over 100 + systems that will require modifications for LNP.
- Developing an electronic communications interface for service provider to service provider communications,
- Testing LNP in our labs, on an intra-network basis and on a inter-network basis
- Costs associated with advancement, due to LNP, of a planned network addition,
- Costs of performing switch translations,
- Costs of database look-ups (DIPS) for non-LNP capable networks;

Operational Support Systems

- ***All systems must be ready before any customer is ported***
 - Some systems/interfaces must be built solely for LNP
 - Some systems vendor dependent
- ***Many systems are inter-related, based on traditional telephony of NXX dedicated to one switch***
- ***System modifications identified so far cost \$67M***

EXAMPLES

- **ATLAS**: New TN administration based on cross wire center application.
- **FACS**: Modification to track inventory and facility assignment.
- **IREIS**: Ensure E911 is processed properly.
- **MATV**: Test turn-up during implementation and service integrity

BellSouth's Type II Cost Breakdown

LNP COST DRIVERS	% OF COST	BST NETWORK ELEMENTS	VOLUME SENSITIVE; PROPORTIONAL TO NETWORK SIZE; NOT NECESSARILY TO PORTED NUMBERS
<i>AIN INFRASTRUCTURE</i> -SCP software/hardware -LSMS gateway	28	16-19 SCP pairs	Proportional to query volume
<i>NETWORK INFRASTRUCTURE</i> -Processor (capacity) requirements hardware/software -LNP switch feature software STP upgrades -switch generics (not included in cost above)	57	112 switches 915 switches 4 pairs of STPs 903 switches	Proportional to query volume Required per office Proportional to query volume Required per office
<i>SERVICE ASSURANCE</i> -Service, provisioning and other system requirements (hardware/software)	15	Currently assessing impacts to 106 systems. Software and/or hardware impacts confirmed in at least 41 systems.	Required before first number ported.

LNP Cost Recovery

- **Cost recovery mechanism must balance who benefits from LNP and who incurs the bulk of the cost;**
- **Total LNP costs (Type 1 & Type 2) must be allocated across all telecommunications carriers;**
- **Timely resolution of cost recovery mechanism is imperative;**
 - **NPAC Vendors must be compensated**
 - **Do not want to use “interim” arrangement**